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July 6, 2020

Via ECF

Hon. Mary Kay Vyskocil  
United States District Court -- Southern District of New York  
Thurgood Marshall United States Courthouse - 40 Foley Square  
New York, New York 10007

Re: Watch Tower Bible and Tract Society of Pennsylvania v. The Truth and  
Transparency Foundation, Ryan C. McKnight, and Ethan G. Dodge, 20-CV-3366

Dear Judge Vyskocil:

My office represents Defendants in the above-captioned action.

Per New York Rule of Professional Conduct, 1.2, I write to advise Your Honor that the scope of my office's representation is limited. Per that rule, a "[a] lawyer may limit the scope of the representation if the limitation is reasonable under the circumstances, the client gives informed consent and where necessary notice is provided to the tribunal and/or opposing counsel." Defendants have only retained my office to appear in this matter so as to effectuate a settlement in principle that the parties have reached. As of the sending of this letter, the parties have yet to execute a settlement agreement but are on the way to doing so. Given the foregoing, my office's appearance in this matter is limited to the foregoing.

Respectfully submitted,

R/E/L

Ryan E. Long

Cc: Mr. Ethan G. Dodge  
Mr. Ryan C. McKnight